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ELECTRONIC FILING

August 19, 2002

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445-12th Street, S.W.
Washington, D.C. 20554

Re: Lucent Technologies Reply Comments

In the Matter of Emergency Services Interconnection Forum's (ESIF) Petition for
Reconsideration of Report and Order Revising the Commission's Rules to Ensure
Compatibility with Enhanced 911 Emergency Calling Systems, Non-initialized
Phones

CC Docket No. 94-102

Dear Ms. Dortch:

Enclosed please find Lucent's Reply Comments in connection with the above
referenced Petition for Reconsideration filed by the Emergency Services Interconnect
Forum (ESIF) on June 12, 2002.

In accordance with the Commission's rules, I am filing a single electronic copy of
these Reply Comments.

Should you have any questions regarding this matter, please contact me at 703-
326-6350.

Sincerely,

/s/ Gena L. Ashe
Corporate Counsel

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Reconsideration of Report and Order)	
Revising the Commission's Rules to)	CC Docket No. 94-102
Ensure Compatibility with Enhanced)	
911 Emergency Calling Systems,)	
Non-initialized Phones)	

REPLY COMMENTS OF LUCENT TECHNOLOGIES INC.

Lucent Technologies hereby files its Reply Comments in the above-captioned proceeding in support of the Petition for Reconsideration filed by the Emergency Services Interconnect Forum (ESIF) on June 12, 2002 (hereafter "Petition for Reconsideration"). With regard to said petition, Lucent Technologies agrees that the Commission should reconsider its Report and Order amending section 20.18 of the Commission's rules (cc Docket 94-102).

As noted in the Petition for Reconsideration, The Alliance for Telecommunications Industry Solutions (ATIS) and the Telecommunications Industry Association (TIA) have jointly published a technical standard¹ that recommends a solution for identifying wireless handsets as lacking call-back capability (the "Joint Standard").² The standard recommends that wireless handsets be programmed with the numbers 911 followed by the last (least significant) digits of the handset's Electronic Serial Number (ESN) or International Mobile Station Equipment Identifier (IMEI). The

¹ In August of 2000, the referenced standard was jointly published by TIA and ATIS in Annex C of J-STD 036

² Page 4 of the Petition for Reconsideration

use of this number provides a quasi-unique identifier for the handsets that, not only alerts the Public Safety Answering Points (“PSAPs”) that a call is being made from a handset with no call-back capability, but should also make it easier to prevent the misuse of the 9-1-1 system due to repeated harassing calls made by non-initialized phones, and to identify legitimate 9-1-1 callers making multiple calls.

As further noted in the Petition for Reconsideration, the numbering methodology recommended in the Joint Standard, while apparently equally effective in alerting a PSAP that a call is being made from a handset that lacks call-back capability, has the added benefit of avoiding the overlap of the 123-456-7890 number with the valid International Roaming MIN (IRM) numbers. This overlap has the potential impact of removing one million numbers from the IRM assignment pool, which, in turn, could have a substantial impact on the wireless industry.³

Lucent Technologies has implemented the numbering recommendation published in the Joint Standard for its wireless infrastructure product line. This solution has been deployed and is working in wireless networks. A change to this numbering methodology could cause a set back in the deployment of 9-1-1 capabilities in wireless systems.

In addition, Lucent Technologies believes that the recommendation published in the Joint Standard is technically superior to the solution specified in the Report and Order for the reasons stated above, and further believes that the effort required to implement another numbering methodology for alerting PSAPs of the lack of call-back capability may delay the deployment of the equipment needed to support wireless 9-1-1 calls.

³ Page 5 of the Petition for Reconsideration

Accordingly, for the reasons set forth above, Lucent supports ESIF's Petition for Reconsideration of the Report and Order adopting Sections 20.18(l)(1)(i) and 20.18(l)(2)(i) of the Commission's rules.

Respectfully Submitted,

Lucent Technologies

By: /s/ Gena L. Ashe

Corporate Counsel

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